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June 3, 2022

Via ECF

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: Stanbro v. Westchester County Health Care Corp., et al.  
Case No. 7:19-cv-10857

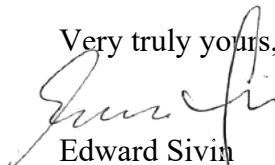
Re: Stanbro v. C.O. Nadya Palou, et al.  
Case No. 20-cv-01591

Your Honor:

The undersigned represents plaintiff in these consolidated actions. I write in response to the June 3, 2022 letter from Claudine Weis, Esq., attorney for defendants Westchester Medical Center and John Full. While I do not object to defendants' request for an extension of time, I wish to clarify recent events.

In an attempt to comply with the Court's directive that by June 3, 2022 the parties submit *joint* proposed jury instructions and a *joint* proposed verdict sheet, on May 23 (11 days ago), I emailed to all parties a draft of plaintiff's proposed jury instructions and verdict sheet, with a request that defendants provide me with their comments. Despite my subsequent written reminders, to date I have not received any comments, let alone any proposed jury instructions or verdict sheets, from any of the defendants. Accordingly, at this point I am in a position to comply with this Court's directive only to the extent of filing *plaintiff's* proposed jury instructions and verdict sheet, which I am doing now.

Very truly yours,



Edward Sivin

Cc: All parties (via ECF)